

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

v.

Case No. 22-MJ-1000 TNL

CONNELL WALTER HARRIS

AFFIDAVIT OF BRYAN LERVOOG
IN SUPPORT OF A CRIMINAL COMPLAINT

Bryan Lervoog, being duly sworn under oath, deposes and states as follows:

INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and have been so employed since May 2014. In my capacity as an ATF agent, my responsibilities include, but are not limited to, investigating firearms violations under Title 18 of the United States Code. During these investigations, I have utilized many investigative methods to include de-briefing cooperating sources, conducting surveillance and serving search warrants. The facts and information contained in this affidavit are based upon my own investigation and observations and those of other agents and other law enforcement officers involved in the investigation. All observations referenced below that were not made by me were relayed to me by the persons who made such observations. This affidavit contains information necessary to support probable cause for the attached complaint. It is not intended to include each and every fact and matter observed by me or known to the Government.

2. This affidavit is submitted in support of a criminal complaint against CONELL WALTER HARRIS (hereinafter "HARRIS") on grounds that he knowingly

and intentionally committed a violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8) (Felon in Possession of a Firearm).

PROBABLE CAUSE

3. Your Affiant is aware that HARRIS has been convicted of the following felonies in the State of Minnesota, which were punishable by a term of imprisonment exceeding one year: Felon in Possession of a Firearm and First-Degree Burglary. According to publicly available records, HARRIS has served multiple prison sentences of more than one year and one day. HARRIS is prohibited from possessing firearms.

4. On November 28, 2022, at approximately 11:08 p.m., Minneapolis Police officers responded to a person with a gun call at 19 Bar in Minneapolis, Minnesota. Remarks of the call indicated that the suspect pulled out a gun after being asked to leave the bar.

5. Officers arrived and immediately saw several people pointing at a male later identified as HARRIS. Officers took HARRIS into custody. HARRIS resisted arrest and kept reaching into the pocket of his hooded sweatshirt. Officers recovered a stolen .45 caliber Glock model 30 pistol, bearing serial number WFA243, from the pocket Harris was reaching into.

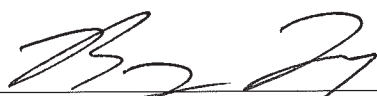
6. Officers spoke to several bar employees and patrons and learned that HARRIS entered the bar and was initially “acting strangely.” HARRIS became upset after a bar employee asked to see his identification—you must be 21 years old to be in the establishment. Harris refused to show his identification and when bar staff requested that he leave the bar Harris became combative and pulled out the pistol. A bar patron

attempted to deescalate the situation but HARRIS became more aggressive and made multiple threatening statements. HARRIS exited for a short time but returned to the bar before law enforcement arrived.

7. Your Affiant knows based on training, experience, and consultation with other law enforcement professionals that Glock pistols are manufactured outside of the State of Minnesota and would necessarily have travelled in interstate commerce to be in Minneapolis, Minnesota.

8. Based on the above information, I submit there is probable cause to believe that HARRIS, knowing that he had been previously convicted of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess a firearm, to wit, a .45 caliber Glock model 30 pistol, bearing serial number WFA243, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

Further your Affiant sayeth not.


Bryan Lerwog, Special Agent
ATF

SUBSCRIBED and SWORN before me
by reliable electronic means via FaceTime and
email pursuant to Fed. R. Crim. P. 41(d)(3).
on 11/30/2022.


The Honorable Tony N. Leung
United States Magistrate Judge